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September 16, 2010

Honorable Renee Marie Bumb, U.S.D.J.
Mitchell H. Cohen U.S. Courthouse
1 John F. Gerry Plaza
Camden, New Jersey 08101

Re: Miller v. Schindler Elevator Corporation, et al.
Docket No.: 09-cv-849-RMB

Dear Judge Bumb:

Pursuant to Rule 7.1(d)(5), we envoke our right to an automatic extension of the return date of Defendant, Bally's Park Place, Inc. d/b/a Claridge Tower at Bally's, motion for declaratory judgment. The new return date for the motion shall be the next available motion date, which is October 18, 2010.

Respectfully submitted,

SONAGERI & FALLON, L.L.C.


JAMES L. SONAGERI

JLS/nb

cc: Ronald B. Grayzel, Esq.
Amy Rudley, Esq.
Colleen L. Brandt, Esq.
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